

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: NATIONAL BROKERS OF AMERICA, INC., Debtor.	Chapter 7 Bankruptcy No. 19-15488
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CHAPTER 7 TRUSTEE’S RESPONSE TO DOCKET NUMBERS 179, 184, 185 AND 189

Robert H. Holber, the Chapter 7 Trustee, (the “Trustee”) files the following Response to the various pleadings filed by the Debtor and Alan Redmond (“Redmond”) and Bene Market LLC (“Bene”) as well as Jason Scott Jordan, Joel A. Ready, Esquire filed under Docket Nos. 179, 184, 185 and 189 (collectively, the “Pleadings”).

BACKGROUND

1. National Brokers of America, Inc. (the “Debtor”) filed a voluntary chapter 7 bankruptcy petition on September 3, 2019 (the “Petition Date”).
2. Thereafter, the Trustee was appointed as the Chapter 7 trustee in this case.
3. On April 19, 2022, this Court approved the settlement between the Trustee and Redmond and Bene resolving all claims of the Trustee against these parties [Docket No. 156] in exchange for total of \$200k to be made in installments (the “Settlement”).
4. Although currently delinquent on the latest installment payments, Redmond and Bene have previously made many payments to the Trustee due under the Settlement.
5. If the defaults are not cured, the Trustee may be back before this Court, to enforce the terms of the Settlement as may be appropriate. All of the Trustee’s rights are reserved in that regard.

RESPONSE

6. The Trustee takes no position regarding the Pleadings other than to state that the above-captioned case should not be dismissed.

7. As a result of the Settlement and other assets obtained by the Trustee throughout his administration of this case, this case is an asset case for which the Trustee intends to make distributions to creditors.

8. As soon as practicable after all payments due under the Settlement are made, the Trustee intends to prepare and file his Trustee's Final Report with this Court.

9. Unless the Court requests otherwise, neither the Trustee nor undersigned counsel respectfully believe that their attendance is necessary at any hearing scheduled to consider the Pleadings.

WHEREFORE, the Trustee respectfully requests that this case not be dismissed, and that the Court otherwise enter such other relief that this Court deems just and proper.

Dated: June 28, 2024

FLASTER/GREENBERG P.C.

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